## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| IN RE: |                            | ) Bankr. No. 19-22653 CMB |
|--------|----------------------------|---------------------------|
|        | STEPHEN R. HANEY AND       |                           |
|        | AMY LOUISE HANEY,          | ) Chapter 13              |
|        | Debtors.                   | )                         |
|        |                            | ) Docket No. 66           |
|        | ROCKET MORTGAGE, LLC.,     | Related to Docket No.     |
|        | f/k/a QUICKEN LOANS, INC., | )                         |
|        | Movant,                    | ) Hearing Date & Time:    |
|        |                            | )                         |
|        | vs.                        | ) Claim No. 4             |
|        |                            | )                         |
|        | STEPHEN R. HANEY AND AMY   | )                         |
|        | LOUISE HANEY AND           | )                         |
|        | RONDA J. WINNECOUR,        | )                         |
|        | CHAPTER 13 TRUSTEE,        | )                         |
|        |                            | )                         |
|        | Respondents.               | )                         |

## **DECLARATION OF MORTGAGE PAYMENT CHANGE**

And Now, comes the Debtors, Stephen R. Haney and Amy Louise Haney, by and through their attorney, who respectfully represents the following:

- 1. On or about June 30, 2019, Debtors filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
- 2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
- 3. Rocket Mortgage, LLC filed a Notice of Mortgage Payment Change. The monthly mortgage payment of \$1,012.43 is being increased to \$1,043.42 effective 12/1/2022.

WHEREFORE, the Debtors request that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Respectfully submitted.

/s/ Rodney D. Shepherd

Rodney D. Shepherd, Esquire

Attorney for the Debtors

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## **CERTIFICATE OF SERVICE**

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 31<sup>st</sup> day of October, 2022, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire Chapter 13 Trustee cmecf@chapter13trusteewdpa.com Rocket Mortgage, LL Attn: Brian C. Nicholas, Esquire bnicholas@kmllawgroup.com

By: /s/ Rodney D. Shepherd Rodney D. Shepherd Attorney for the Debtors PA I.D. No. 56914 rodsheph@cs.com 2403 Sidney Street Suite 208 Pittsburgh, PA 15203 412 471-9670